U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

January 23, 2015

VIA CERTIFIED MAIL AND FAX TO: 307-237-3164

Mr. Tad True
President
Bridger Pipeline, LLC
455 N. Poplar St.
P.O. Drawer 2360
Casper, WY 82602

Re: CPF No. 5-2015-5003H

Dear Mr. True:

Enclosed is a Corrective Action Order issued today in the above-referenced case. It requires Bridger Pipeline, LLC, to take certain corrective actions with respect to the Poplar Pipeline system that failed on January 17, 2015, near Glendive, Montana. Service is being made by certified mail and facsimile. Service of the Corrective Action Order by electronic transmission is deemed complete upon transmission and acknowledgement of receipt, or as otherwise provided under 49 C.F.R. § 190.5. The terms and conditions of this Order are effective upon completion of service.

Thank you for your cooperation in this matter.

Sincerely,

Jeffrey D. Wiese
Associate Administrator
for Pipeline Safety

Enclosure

cc: Ms. Linda Daugherty, Deputy Associate Administrator for Field Operations, OPS
Mr. Chris Hoidal, Director, Western Region, OPS

U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590

In the Matter of	)	
Bridger Pipeline, LLC,	)	**CPF No. 5-2015-5003H**
Respondent.	)	

CORRECTIVE ACTION ORDER

Purpose and Background:

This Corrective Action Order (Order) is being issued, under the authority of 49 U.S.C. § 60112, to require Bridger Pipeline, LLC (Bridger or Respondent), to take necessary corrective action to protect the public, property, and the environment from potential hazards associated with the recent failure on Bridger's Poplar Pipeline system.

On January 17, 2015, a reportable accident occurred on the Poplar Pipeline, resulting in the release of approximately 300-1200 barrels of crude oil (the Failure). The Poplar Pipeline is a 10- and 12-inch diameter pipeline approximately 193 miles in length that transports crude oil from the Raymond meter station in Sheridan County, Montana, to the Baker station in Fallon County, Montana (Poplar Pipeline or Affected Pipeline). The cause of the Failure has not yet been determined. Pursuant to 49 U.S.C. § 60117, the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), initiated an investigation of the accident. The preliminary findings of the ongoing investigation are as follows:

Preliminary Findings:

- Bridger is one of a group of companies known generally as the True Companies. Bridger owns and operates the Poplar Pipeline System in eastern Montana, the Four Bears Pipeline System in North Dakota, the Parshall gathering system in North Dakota, and the Powder River gathering system in Wyoming.[1]

- Bridger has indicated that the Poplar Pipeline (Affected Pipeline) is composed of the following segments:

[1] http://truecompanies.truecos.com/Bridger/, last accessed January 22, 2015.

- The pipeline segment between Raymond station and Poplar station, which consists of 56, miles of 12-inch, X-52, 0.188-inch wall thickness, electric resistance welded (ERW) pipe, installed in 1972.

- The pipeline segment between Poplar station and Glendive station consists of 84 miles of 10-inch, X-46, mostly 0.250-inch wall thickness, ERW pipe, installed in 1955. In 2005, six miles of pipe were replaced between Poplar station and Glendive station. This pipeline segment crosses the Missouri River and was installed by horizontal directional drilling (HDD). This pipeline segment also crosses the Poplar River and was installed using an open-cut river crossing.

- The pipeline segment between Glendive station and Baker station consists of 53 miles of 12-inch, X-52, mostly 0.250-inch wall thickness, ERW pipe, installed in 1955. In 1967, 2250 feet of this pipe was replaced with 12-inch nominal diameter, X52, 0.500-inch wall thickness pipe manufactured by National Tube. This portion of the pipeline crosses the Yellowstone River. The 1967 river crossing was made using an open-cut method: a trench was excavated in the bottom of the river channel, the pipeline was laid in the open cut, and the trench then filled with backfill from the excavation.

- The Failure took place on a segment of the Poplar Pipeline between the "North Block Valve" at milepost (MP) 143.2 on the northwest side of the Yellowstone River and the "South Block Valve" at MP 144.4 on the southeast side of the Yellowstone River, near Glendive, Montana (Isolated Segment). The pipe segment that failed lay within the Isolated Segment and was installed in 1967. Bridger states that this replaced pipe is seamless. To confirm this, following the Failure, Bridger excavated a piece of pipe on the bank of the river, and found that it was seamless.

- The maximum operating pressure (MOP) of the pipeline at the Failure site is 1200 psig, as established by hydrostatic test in 1996. At the time of the Failure, the actual operating pressure of the pipeline was 523 psig.

- At approximately 12:30pm EST on Saturday, January 17, 2015, the controller in the Bridger Pipeline control room who was operating the Poplar Pipeline unit observed a flow imbalance on his SCADA screen and began to investigate. The abnormal readings were in the segment between the North Block Valve and the South Block Valve on either side of the Yellowstone River crossing, approximately 5 miles upstream from Glendive, Montana. The two block valves are approximately 6800 feet apart and are motorized gates block valves and operated by the company's control center in Casper, Wyoming. Shortly thereafter, flow imbalance alarms sounded and the controller began shutting the pipeline down. The pipeline was shut down at approximately 1:00pm EST and the North and South Block Valves were closed. Bridger personnel went out to investigate, but could not ascertain whether there had been a release or not due to considerable ice on the river.

- Bridger filed a report with NRC at 5:58 pm EST (NRC #1105930), indicating a possible release into the Yellowstone River. At about 5:00pm EST, Bridger notified local

authorities of a potential release and the Montana Department of Environmental Quality notified municipal water utilities of the potential of crude oil passing by their water intakes on the Yellowstone River.

- At first light on Sunday, January 18, 2015, Bridger discovered an oil sheen in open water on the Yellowstone River approximately three quarters of a mile downstream from the pipeline crossing, and also a sheen at approximately 18 miles downstream. No oil sheen was observed at a point approximately 20 miles downstream. Based on this information, Bridger updated its earlier NRC report to state that there was a release of crude oil into the Yellowstone River. The amended NRC report filed at 10:12am EST on January 18, 2015, was given a new number (NRC # 1105969).

- The spill response began at approximately 2:00pm EST on January 18, 2015. Attempts to boom the Yellowstone River at Sidney, Montana, approximately 30 miles downstream, were not successful due to river ice.

- The release amount is not known at this time. A meter-in, meter-out barrel count indicates a loss of 300 barrels. The line pack between the two block valves is approximately 900 barrels. Therefore it is reasonable to assume 1200 barrels of crude oil has been released, composed primarily of Bakken crude. As of January 23, 2015, approximately 274 barrels of crude oil have been recovered.

- Various state and federal agencies responded to the scene, including the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, the Montana Department of Disaster and Emergency Services, the Montana Department of Environmental Quality, and PHMSA.

- The cause of the Failure is unknown and the investigation is ongoing. The actual release site has been determined to be in the Yellowstone River near the Southeast bank, but the exact location has not been located. The operator has not initiated repairs, as they are still trying to locate the source of the release.

- The Failure site is upstream from an Ecological Unusually Sensitive Area and Drinking Water Unusually Sensitive Area. The Affected Pipeline crosses an additional Ecological Unusually Sensitive Area at the Missouri River.

- The Affected Pipeline is currently partially shut down. The segment from Raymond Station to Poplar Station was not operating at the time of the Failure, and is under nitrogen blanket. The portion from Poplar Station to the Gas City Creek injection point, approximately six miles downstream of the South Block Valve, remains shut down. This portion includes the Isolated Segment. The portion of pipeline from the Gas City Creek injection point to Baker Station is currently operating.

- The accident did not cause any known injuries or evacuations. Low or trace levels of hydrocarbons have been detected in the Glendive water system. The water system is being monitored and Bridger is offering bottled water to Glendive water customers.

- Bridger indicates that the Isolated Segment was assessed by hydrostatic test in 1996, in-line crack tool in 2010, and in-line MFL tool in 2013. In addition, Bridger conducted a depth of cover survey in 2011 which indicated adequate cover over the pipe.

Determination of Necessity for Corrective Action Order and Right to Hearing:

Section 60112 of Title 49, United States Code, provides for the issuance of a Corrective Action Order, after reasonable notice and the opportunity for a hearing, requiring corrective action, which may include the suspended or restricted use of a pipeline facility, physical inspection, testing, repair, replacement, or other action, as appropriate. The basis for making the determination that a pipeline facility is or would be hazardous, requiring corrective action, is set forth both in the above-referenced statute and 49 C.F.R. § 190.233, a copy of which is enclosed.

Section 60112 and the regulations promulgated thereunder provide for the issuance of a Corrective Action Order, without prior notice and opportunity for hearing, upon a finding that failure to issue the Order expeditiously would result in the likelihood of serious harm to life, property, or the environment. In such cases, an opportunity for a hearing and expedited review will be provided as soon as practicable after the issuance of the Order.

After evaluating the foregoing preliminary findings of fact, I find that continued operation of the pipeline without corrective measures is or would be hazardous to life, property, or the environment. Additionally, having considered the uncertainties as to the cause of the Failure, the location of the Failure, the material being transported, the proximity of the pipeline to navigable waterways, populated areas, public water intake systems, or other High Consequence Areas, and the inaccessibility of the pipe, I find that a failure to issue this Order expeditiously to require immediate corrective action would result in the likelihood of serious harm to life, property, or the environment.

Accordingly, this Corrective Action Order mandating immediate corrective action is issued without prior notice and opportunity for a hearing. The terms and conditions of this Order are effective upon receipt.

Within 10 days of receipt of this Order, Respondent may contest its issuance and obtain expedited review either by answering in writing or requesting a hearing under 49 C.F.R. § 190.211, to be held as soon as practicable under the terms of such regulation, by notifying the Associate Administrator for Pipeline Safety in writing, with a copy to the Director, Western Region, OPS (Director). If Respondent requests a hearing, it will be held telephonically or in-person in Denver, Colorado, or Washington, D.C.

After receiving and analyzing additional data in the course of this investigation, PHMSA may identify other corrective measures that need to be taken. In that event, PHMSA will notify Respondent of any additional measures that are required and an amended Order issued, if necessary. To the extent consistent with safety, Respondent will be afforded notice and an opportunity for a hearing prior to the imposition of any additional corrective measures.

Required Corrective Actions:

Pursuant to 49 U.S.C. § 60112, I hereby order Bridger to immediately take the following corrective actions to address the January 17, 2015, failure on the Poplar Pipeline:

1. **Shutdown of Affected Pipeline**. Bridger must cease operation of the entire Affected Pipeline, and must not resume operation of the Affected Pipeline until authorized to do so by the Director.

2. **Restart Plan**. Prior to resuming operation of the Affected Pipeline, Bridger must develop and submit a written Restart Plan to the Director for approval.

   a. The Director may approve the Restart Plan incrementally without approving the entire plan. Segments of the Affected Pipeline may be approved for restart separately, but cannot resume operation until all applicable portions of the Restart Plan are approved.

   b. Once approved by the Director, the Restart Plan will be incorporated by reference into this Order.

   c. The Restart Plan must provide for adequate patrolling of the Affected Pipeline during the restart process, to include continuous monitoring at the Glendive and Cabin Creek Stations, the North Block Valve, the South Block Valve, and the Yellowstone River Crossing. The Restart Plan must include incremental pressure increases during start up, with each increment to be held for at least two hours.

   d. The Restart Plan must specify a day-light restart and include advance communications with local emergency response officials.

   e. The Restart Plan must provide for a review of the Affected Pipeline for conditions similar to those at the Failure site, including a review of construction, operating and maintenance (O&M) and integrity management records such as in-line inspection (ILI) results, hydrostatic tests, root cause analysis of prior failures, aerial and ground patrols, corrosion, cathodic protection, excavations and pipe replacements. Operator must address any findings that require remedial measures to be implemented prior to restart.

   f. The Restart Plan must also include documentation of the completion of all mandated actions, and a management of change plan to ensure that all procedural modifications are incorporated into Bridger's operations and maintenance procedures manual.

   g. The Restart Plan must provide for hydrostatic pressure testing of the Isolated Segment prior to resuming operation. The proposed plan for hydrostatic testing must be at a pressure sufficient to strength test the pipeline considering the size of any flaws that would survive the pressure test, and conform to the requirements of 49 CFR Part 195, Subpart E. The hydrostatic test must also include a 30-minute spike test. Any segments of pipe that fail during the testing must be removed and sent to an approved laboratory for metallurgical testing. Respondent must provide continuous patrolling of the Affected

Pipeline between MP 143.2 and MP 144.4 at the Yellowstone River crossing at all times until hydrostatic testing is completed.

3. **Operating Pressure Restriction.** After the Director approves the Restart Plan, Bridger may return the pipeline to service but must reduce and maintain a twenty percent (20%) pressure reduction in the actual operating pressure along the entire length of the pipeline such that the operating pressure along the pipeline will not exceed eighty percent (80%) of the actual operating pressure in effect immediately prior to the failure on January 17, 2015.

   a. This pressure restriction is to remain in effect until written approval to increase the pressure or return the pipeline to its pre-failure operating pressure is obtained from the Director.

   b. Prior to resuming operation, Bridger must provide the Director the actual operating pressures of each metering station and each main line pressure regulating station on the pipeline at the time of Failure and the reduced pressure restriction set-points at these same locations.

   c. This pressure restriction requires any relevant remote or local alarm limits, software programming set-points or control points, and mechanical over-pressure devices to be adjusted accordingly.

   d. When determining the pressure restriction set-points, Bridger must take into account any ILI features or anomalies present in the pipeline to provide for continued safe operation while further corrective actions are completed.

   e. Bridger must review the pressure restriction monthly by analyzing the operating pressure data. The company must take into account any ILI features or anomalies present in the Affected Pipeline and immediately reduce the operating pressure to maintain the safe operations of the Affected Pipeline, if warranted by the monthly review. Bridger must submit the results of the monthly review to the Director within one week of completion. The results must include, at a minimum, the current discharge set-points (including any additional pressure reductions), and any pressure exceedance at discharge set-points.

4. **Removal of Pressure Restriction**. The Director may allow the removal or modification of the pressure restriction upon a written request from Bridger demonstrating that restoring the pipeline to its pre-failure operating pressure is justified based on a reliable engineering analysis showing that the pressure increase is safe considering all known defects, anomalies, and operating parameters of the pipeline.

5. **Records Verification**. As recommended in PHMSA Advisory Bulletin 2012-06, Bridger must verify the records for the Affected Pipeline to confirm the MOP. Bridger must submit documentation of this record verification for the Isolated Segment to the Director within 30 days of receipt of this Order, and within 90 days for the remaining portion of the Affected Pipeline, and must make the supporting records available upon request for review.

6. **Review of Prior ILI Results.** Within 30 days of receipt of this Order, Bridger must conduct a review of any previous inline ILI results of the Affected Pipeline and re-evaluate all ILI results from the past 10 calendar years, including a review of the ILI vendors' raw data and analysis. Bridger must determine whether any features were present in the failed pipe and/or any other pipe removed and determine whether any pipe or components with similar characteristics are present elsewhere on the Affected Pipeline. Bridger must submit documentation of this ILI review to the Director within 45 days of receipt of this Order. Additionally, Bridger must make all ILI records and results available to PHMSA's experts for independent review.

7. **Inline Inspection (ILI).** Within 6 months of resuming operation of each segment of the Affected Pipeline, Bridger must perform an ILI of the Affected Pipeline. The type of tool(s) must be able to detect anomalies of any identified threats, such as seam anomalies, metal loss, or corrosion defects. The Director must provide prior approval of the final criteria and technology considerations taken into account in selecting the specific inspection tools. Technology considerations and final criteria should account for the size (length and depth) of any possible seam anomalies and the possibility of selective seam corrosion in the Affected Pipeline. The ILI tool must also include consideration of best available technology to reliably detect and size seam anomalies in casings. The data analysis must be completed within 30 days of successful completion of the ILI. The ILI vendor must evaluate the results per a performance specification chosen by the operator and approved by the Director. The ILI vendor must distribute all reports in their entirety (including all media), whether preliminary or final, to the Director and the Respondent at the same time. Within 90 days after performing the ILI, Respondent must submit a final report to the Director with a comparison of the results of this ILI with the results of previous ILIs and criteria and a plan for remediation of anomalies.

8. **Mechanical and Metallurgical Testing.** Within 45 days of receipt of this Order, Bridger must complete independent mechanical and metallurgical testing and failure analysis of the failed pipe, including an analysis of soil samples and any foreign materials. Complete the testing and analysis as follows:

    a. Document the chain-of-custody when handling and transporting the failed pipeline and other evidence from the failure site.

    b. Within 10 days of receipt of this Order, develop and submit the testing protocol and the proposed testing laboratory to the Director for prior approval.

    c. At least seven days prior to beginning the mechanical and metallurgical testing, provide the Director with the scheduled date, time, and location of the testing to allow for an OPS representative to witness the testing.

    d. Ensure the testing laboratory distributes all reports whether draft or final in their entirety to the Director at the same time they are made available to Bridger.

9. **Root Cause Failure Analysis.** Within 60 days following receipt of this Order, Bridger must complete a root cause failure analysis (RCFA) and submit a final report of this

RCFA to the Director. The RCFA must be facilitated by an independent third-party acceptable to the Director and must document the decision-making process and all factors contributing to the failure. The final report must include findings and any lessons learned and whether the findings and any lessons learned are applicable to other locations within Bridger's pipeline system.

10. **Emergency Response Plan and Training Review**. Bridger must review and assess the effectiveness of its emergency response plan and oil spill response plan with regards to the Failure. Include in the review and assessment the on-scene response and support, coordination, and communication with emergency responders and public officials. As part of this review, Bridger should seek input from Federal, State, and Local officials and agencies who participated in the actual response. Also, include a review and assessment of the effectiveness of its emergency training program. Bridger must amend its emergency response plan and emergency training, if necessary, to reflect the results of this review. The documentation of this Emergency Response Plan and Training Review must be available for inspection by OPS or provided to the Director, if requested. Revisions to the Oil Spill Response Plan must be submitted to the Director, Emergency Support, and Security Division for review and approval in accordance with 49 C.F.R. Part 194.

11. **Operational Integrity and Remediation Plan (OIRP).**

    a. Within 90 days following receipt of this Order, Bridger must submit an Operational Integrity and Remediation Plan (OIRP) to the Director for approval.

    b. The Director may approve the OIRP incrementally without approving the entire OIRP.

    c. Once approved by the Director, the OIRP will be incorporated by reference into this Order.

    d. The OIRP must specify the tests, inspections, assessments, evaluations, and remedial measures Bridger will use to verify the integrity of the pipeline. It must address all known or suspected factors and causes of the January 17, 2015, failure. Bridger should consider both the risk of another failure and the consequence of another failure to develop a prioritized schedule for OIRP related work along the Affected Segment.

    e. The OIRP must include a procedure or process to:

        i. Identify pipe along the pipeline with characteristics similar to the contributing factors identified for the January 17, 2015, failure.
        ii. Gather all data necessary to review the failure history (in service and pressure test failures) of the Affected Pipeline and to prepare a written report containing all the available information such as the locations, dates, and causes of leaks and failures.

iii. Integrate the results of the metallurgical testing, root cause failure analysis, and other corrective actions required by this Order with all relevant pre-existing operational and assessment data for the pipeline. Pre-existing operational data includes, but is not limited to, construction, operations, maintenance, testing, repairs, prior metallurgical analyses, and any third party consultation information. Pre-existing assessment data includes, but is not limited to, ILI tool runs, hydrostatic pressure testing, direct assessments, close interval surveys, and DCVG/ACVG surveys.

iv. Determine whether conditions similar to those contributing to the failure on January 17, 2015, are likely to exist elsewhere on the pipeline.

v. Conduct additional field tests, inspections, assessments, and/or evaluations to determine whether, and to what extent, the conditions associated with the failure on January 17, 2015, and other failures from the failure history or any other integrity threats are present elsewhere on the Affected Pipeline. This process must include a risk assessment of all water crossings greater than 100 feet and an analysis of whether Horizontal Directionally Drilled (HDD) crossings should be installed at these locations. This process must consider all failure causes and specify the use of one or more of the following:
    1) Inline inspection (ILI) tools that are technically appropriate for assessing the pipeline system based on the cause of failure on January 17, 2015, and that can reliably detect and identify anomalies,
    2) Hydrostatic pressure testing,
    3) Close-interval surveys,
    4) Cathodic protection surveys, to include interference surveys in coordination with other utilities (e.g. underground utilities, overhead power lines, etc.) in the area,
    5) Coating surveys,
    6) Stress corrosion cracking surveys,
    7) Selective seam corrosion surveys; and,
    8) Other tests, inspections, assessments, and evaluations appropriate for the failure causes.

vi. Describe the inspection and repair criteria Bridger will use to prioritize, excavate, evaluate, and repair anomalies, imperfections, and other identified integrity threats. Include a description of how any defects will be graded and a schedule for repairs or replacement.

vii. Based on the known history and condition of the pipeline, describe the methods Bridger will use to repair, replace, or take other corrective measures to remediate the conditions associated with the pipeline failure on January 17, 2015, and to address other known integrity threats along the Affected Pipeline. The repair, replacement, or other corrective measures must meet the criteria specified in the paragraph (vi) above. At a minimum, HDD pipeline crossings must be installed at the Yellowstone River and Poplar River crossings within 90 days after resuming operation at the respective pipeline crossing.

viii. Provide the Director with the scheduled date, time, and location of any pipe removal or installation to allow for a PHMSA representative to witness the work.
ix. Implement continuing long-term periodic testing and integrity verification measures to ensure the ongoing safe operation of the Affected Pipeline considering the results of the analyses, inspections, evaluations, and corrective measures undertaken pursuant to the Order.

f. Include a proposed schedule for completion of the OIRP.

g. Bridger must revise the OIRP as necessary to incorporate new information obtained during the failure investigation and remedial activities, to incorporate the results of actions undertaken pursuant to this Order, and/or to incorporate modifications required by the Director.
i. Submit any plan revisions to the Director for prior approval.
ii. The Director may approve plan revisions incrementally.
iii. Any and all revisions to the OIRP after it has been approved and incorporated by reference into this Order will be fully described and documented in the CAO Documentation Report (CDR).

h. Implement the OIRP as it is approved by the Director, including any revisions to the plan.

12. **CAO Documentation Report (CDR)**. Bridger must create and revise, as necessary, a CAO Documentation Report (CDR). When Bridger has concluded all the items in this Order it will submit the final CDR in its entirety to the Director. This will allow the Director to complete a thorough review of all actions taken by Bridger with regards to this Order prior to approving the closure of this Order. The intent is for the CDR to summarize all activities and documentation associated with this Order in one document.

a. The Director may approve the CDR incrementally without approving the entire CDR.

b. Once approved by the Director, the CDR will be incorporated by reference into this Order.

c. The CDR must include but not be limited to:

i. Table of Contents;
ii. Summary of the pipeline failure of January 17, 2015, and the response activities;
iii. Summary of pipe data/properties and all prior assessments of the Affected Segment;
iv. Summary of all tests, inspections, assessments, evaluations, and analysis required by the Order;
v. Summary of the Mechanical and Metallurgical Testing as required by the Order;

vi. Summary of the RCFA with all root causes as required by the Order;
vii. Documentation of all actions taken by Bridger to implement the OIRP, the results of those actions, and the inspection and repair criteria used;
viii. Documentation of any revisions to the OIRP including those necessary to incorporate the results of actions undertaken pursuant to this Order and whenever necessary to incorporate new information obtained during the failure investigation and remedial activities;
ix. Lessons learned while completing this Order;
x. A path forward describing specific actions Bridger will take on its entire pipeline system as a result of the lessons learned from work on this Order; and
xi. Appendices (if required).

Other Requirements:

1. *Reporting.* Bridger must submit quarterly reports to the Director that: (1) include all available data and results of the testing and evaluations required by this Order; and (2) describe the progress of the repairs or other remedial actions being undertaken. The first quarterly report is due on March 31, 2015. The Director may change the interval for the submission of these reports.

2. *Approvals.* With respect to each submission requiring the approval of the Director, the Director may: (a) approve the submission in whole or in part; (b) approve the submission on specified conditions; (c) modify the submission to cure any deficiencies; (d) disapprove the submission in whole or in part and direct Respondent to modify the submission; or (e) any combination of the above. In the event of approval, approval upon conditions, or modification by the Director, Respondent shall proceed to take all action required by the submission, as approved or modified by the Director. If the Director disapproves all or any portion of a submission, Respondent must correct all deficiencies within the time specified by the Director and resubmit it for approval.

3. *Extensions of Time.* The Director may grant an extension of time for compliance with any of the terms of this Order upon a written request timely submitted and demonstrating good cause for an extension.

4. *Documentation of Costs.* It is requested but not required that Respondent maintain documentation of the costs associated with implementation of this Order. Include in each quarterly report the to-date total costs associated with: (1) preparation and revision of procedures, studies and analyses; (2) physical changes to pipeline infrastructure, including repairs, replacements and other modifications; and (3) environmental remediation, if applicable.

The actions required by this Corrective Action Order are in addition to and do not waive any requirements that apply to Respondent's pipeline system under 49 C.F.R. Part 195, under any

other order issued to Respondent under authority of 49 U.S.C. § 60101, *et seq.*, or under any other provision of Federal or State law.

Respondent may appeal any decision of the Director to the Associate Administrator for Pipeline Safety. Decisions of the Associate Administrator shall be final.

Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Failure to comply with this Order may result in the assessment of civil penalties and in referral to the Attorney General for appropriate relief in United States District Court pursuant to 49 U.S.C. § 60120.

In your correspondence on this matter, please refer to CPF No. 5-2015-5003H and for each document you submit, please provide a copy in electronic format whenever possible.

The terms and conditions of this Corrective Action Order are effective upon receipt.

Jeffrey D. Wiese
Associate Administrator
for Pipeline Safety

January 23, 2015
Date Issued